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Case No. 05-44481 (aig)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re :

DELPHI CORPORATION, *et al.* : Chapter 11

Debtor. :

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NOTICE OF RECLAMATION

PLEASE TAKE NOTICE, that on October 19, 2005, National Molding Corp. ("National") served upon Debtor Delphi Corporation ("Delphi") a timely written demand for reclamation of certain goods (<u>i.e.</u> automotive parts, goods and equipment) shipped by National to Delphi with an aggregate value of at least \$86,150.48, and as described in greater detail in such written demand. (A copy of this written demand is annexed hereto as Exhibit "A").

National respectfully requests permission, pursuant to 11 U.S.C. § 546(c)(1), to reclaim and recover from Delphi the goods specified in Exhibit "A" and that the Bankruptcy Court direct Delphi to return these goods to National promptly. Alternatively, in the event the Court denied reclamation, National respectfully requests the Court (i) to grant National, pursuant to 11 U.S.C. § 503(b) and 11 U.S.C. § 546(c)(2)(A), and administrative priority claim in the amount of at least \$86,150.48, or (ii) to grant National pursuant to 11 U.S.C. § 546(c)(2)(B), a secured claim in the amount of at least \$86,150.48, as if National held a validly perfected lien and security interest in such an amount.

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National expressly reserves all of its rights and remedies available under the United States Bankruptcy Code, including but not limited to the right to file an adversary proceeding, and to supplement this Notice.

Dated: Westbury, New York

October 18, 2005 PRYOR & MANDELUP, LLP

Attorneys for National Molding Corporation

By: /s/ Kenneth A. Reynolds

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